

Objections Due: February 26, 2020

Presentment Date: March 4, 2020

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK

In re:

ORION HEALTHCORP, INC.
 CONSTELLATION HEALTHCARE TECHNOLOGIES, INC.
 NEMS ACQUISITION, LLC
 NORTHEAST MEDICAL SOLUTIONS, LLC
 NEMS WEST VIRGINIA, LLC
 PHYSICIANS PRACTICE PLUS, LLC
 PHYSICIANS PRACTICE PLUS HOLDINGS, LLC
 MEDICAL BILLING SERVICES, INC.
 RAND MEDICAL BILLING, INC.
 RMI PHYSICIAN SERVICES CORPORATION
 WESTERN SKIES PRACTICE MANAGEMENT, INC.
 INTEGRATED PHYSICIAN SOLUTIONS, INC.
 NYNM ACQUISITION, LLC
 NORTHSTAR FHA, LLC
 NORTHSTAR FIRST HEALTH, LLC
 VACHETTE BUSINESS SERVICES, LTD.
 MDRX MEDICAL BILLING, LLC
 VEGA MEDICAL PROFESSIONALS, LLC
 ALLEGIANCE CONSULTING ASSOCIATES, LLC
 ALLEGIANCE BILLING & CONSULTING, LLC
 PHOENIX HEALTH, LLC
 NEW YORK NETWORK MANAGEMENT, LLC,

Debtors.

Chapter 11

Case No. 18-71748 (AST)
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 Case No. 18-71789 (AST)
 Case No. 18-74545 (AST)
 (Jointly Administered)

NOTICE OF PRESENTMENT OF APPLICATION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that the undersigned will present the attached *Application to Withdraw as Counsel* (the “Application”) to the Honorable Alan S. Trust, United States Bankruptcy Judge, United States Bankruptcy Court, Eastern District of New York, Courtroom 960 at the Alfonse M. D’Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722 (the “Bankruptcy Court”) for signature on **March 4, 2020 at 9:00 a.m.**

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Application is filed electronically with the Bankruptcy Court in accordance with General Rule M-399 (a copy of which can be found at www.nysb.uscourts.gov, the official website for the United States

Bankruptcy Court), and served upon: (i) the undersigned withdrawing attorneys for Elizabeth Kelly, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., 666 Third Avenue, New York, New York 10017, Attn: Paul J. Ricotta and Kaitlin R. Walsh; (ii) substitute counsel for Elizabeth Kelly, Silverman Acampora LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: Anthony C. Acampora; (iii) counsel to Howard M. Ehrenberg, Liquidating Trustee, Satterlee Stephens LLP, 230 Park Avenue, 11th Floor, New York, New York 10169, Attn: Christopher R. Belmonte, Pamela A. Bosswick, and Abigail Snow; (iv) counsel to the Debtors, DLA Piper US LLP, 1251 Avenue of the Americas, New York, NY 10020, Attn: Thomas R Califano, (v) counsel for the Committee, Pachulski, Stang, Ziehl & Jones, 780 Third Avenue, New York, NY 10017, Attn: Illan D. Scharf; and (vi) the Office of the U.S. Trustee for the Eastern District of New York, Central Islip Division, Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, Attn: Christine H. Black, no later than **February 26, 2020 at 11:59 p.m.** (the "Objection Deadline"), there will be no hearing and the Order will be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed and served by the Objection Deadline, the Court may set a hearing and direct notice to parties.

DATED: February 12, 2020

Respectfully submitted,

/s/ Paul J. Ricotta
 Paul J. Ricotta, Esq.
 Kaitlin R. Walsh, Esq.
 Francis J. Earley, Esq.
 Dominic J. Picca, Esq.
 MINTZ, LEVIN, COHN, FERRIS,
 GLOVSKY AND POPEO, P.C.
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APPLICATION TO WITHDRAW AS COUNSEL

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. (“Mintz”) respectfully moves for leave of the Court to withdraw as counsel to Elizabeth Kelly in the above-captioned proceedings. Pursuant to the Notice of Appearance of Counsel and Request for Service of Papers filed on January 16, 2020 [Docket No. 796], Ms. Kelly has retained the law firm Silverman Acampora LLP as substitute counsel. Ms. Kelly consents to this withdrawal and substitution.

WHEREFORE, Mintz respectfully requests that this Court enter an order authorizing Mintz's withdrawal as counsel and that the Court grant such other and further relief as it deems just and proper.

DATED: February 12, 2020

Respectfully submitted,

/s/ Paul J. Ricotta

Paul J. Ricotta, Esq.

Kaitlin R. Walsh, Esq.

Francis J. Earley, Esq.

Dominic J. Picca, Esq.

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**AFFIDAVIT IN SUPPORT OF
APPLICATION TO WITHDRAW AS COUNSEL**

Paul J. Ricotta, under penalty of perjury, affirms and states as follows:


1. I am a member of the firm of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. (“Mintz”). I am submitting this affidavit in support of Mintz’s application to withdraw as counsel to Elizabeth Kelly.

2. Pursuant to the Notice of Appearance of Counsel and Request for Service of Papers filed on January 16, 2020 [Docket No. 796], Ms. Kelly has retained the law firm

Silverman Acampora LLP as substitute counsel. Ms. Kelly consents to this withdrawal and substitution.

3. The facts contained in the annexed application are true and correct to the best of my knowledge, information and belief.

Dated: February 12, 2020
New York, New York



Paul J. Ricotta, Esq.

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ORDER AUTHORIZING WITHDRAWAL OF COUNSEL

Upon the application of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. to withdraw as attorneys to Elizabeth Kelly, and after due deliberation and sufficient cause appearing therefor, it is

ORDERED, that under Local Rule 2090-1(d), Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. be, and it hereby is, authorized to withdraw as attorneys for Elizabeth Kelly.

The Honorable Alan S. Trust
Chief United States Bankruptcy Court Judge

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CERTIFICATE OF SERVICE

I, Paul J. Ricotta, do hereby certify that on the 12h day of February, 2020, I caused copies of the *Application to Withdraw as Counsel* to be served through the ECF system, and that copies have been sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: February 12, 2020

/s/ Paul J. Ricotta
Paul J. Ricotta